

UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEW JERSEY

In the Matter of the Extradition of ) Hon. Michael A. Hammer, U.S.M.J.  
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Jonathan Camus Ben-Shimon, )  
a/k/a Jonathan Camus Bensimon, ) Mag. No. 22-10021  
a/k/a Camus Jonathan Ben Simon, )  
a/k/a Camus Jonathan Bensimon )

COMPLAINT  
(18 U.S.C. § 3184)

I, the undersigned Assistant United States Attorney, being duly sworn, state on information and belief that the following is true and correct:

1. In this matter, I represent the United States in fulfilling its treaty obligation to Switzerland.
2. There is an extradition treaty in force between the United States and the Government of the Swiss Confederation (“Switzerland”). *See* Extradition Treaty Between the Government of the United States of America and the Government of the Swiss Confederation, U.S.-Switz., Nov.14, 1990, S. TREATY DOC. NO. 104-9 (1995) (the “Treaty”).
3. The Treaty provides in Article 13 for the provisional arrest and detention of alleged fugitives pending the submission of a formal request for extradition and supporting documents.
4. In accordance with Article 13 of the Treaty, Switzerland has asked the United States for the provisional arrest of dual French/Israeli citizen, Jonathan Camus Ben-Shimon, a/k/a Jonathan Camus Bensimon, a/k/a Camus Jonathan Ben Simon, and a/k/a Camus Jonathan Bensimon (“BEN-SHIMON” or the “fugitive”), with a view toward his extradition.
5. According to the information the Government of the Switzerland has provided, BEN-SHIMON is accused of offenses including (1) data theft, in violation of Article 143 of the Swiss

Criminal Code (“SCC”); (2) unauthorized access to a computer system, in violation of SCC Article 143bis; and (3) fraudulent use of a computer for commercial gain, in violation of SCC Article 147.

6. These offenses were committed within the jurisdiction of Switzerland. On January 24, 2022, Federal Prosecutor for the Swiss Confederation, Yves Nicolet, a judicial officer authorized by Swiss law to issue warrants of arrest, issued a warrant in Bern, Switzerland, for BEN-SHIMON’s arrest for these offenses.<sup>1</sup> According to the information the Government of Switzerland has provided:

- a. Between approximately December 2016 and October 2018, BEN-SHIMON participated in a “fake bank technician scam” against Swiss businesses to fraudulently gain access to the victim businesses’ protected computers, data, and funds. Several of the victim companies filed complaints with the Swiss authorities. Swiss authorities have identified more than one hundred instances of the scam, which included many unauthorized attempted transfers and at least eight victim companies experiencing unauthorized money transfers that collectively resulted in a loss amount exceeding 5 million euros.
- b. Information Swiss authorities collected from the victim companies reflected that a perpetrator would contact an employee of a victim company claiming to be a representative of the company’s bank. The perpetrator would advise the victim employee that the bank would be updating its e-banking system and required the victim employee to log on to the e-banking website. The perpetrator would then request that the victim employee type in a specific URL address in their internet browser, which, unbeknownst

to the employee, would download software that provided the perpetrators with direct access to the victim's computer. Upon gaining access to the victims' computers, the perpetrators were able to gain access to a large amount of data relating to the victim companies' banking activities, to include information about the injured companies' bank accounts and financial transactions, which allowed them to unlawfully transfer money from the victims' bank accounts. Subsequent analyses of the victims' bank accounts by Swiss investigators showed that the perpetrators transferred funds from the victim companies' accounts to foreign bank accounts in Europe and Asia.

- c. Additional information collected by the Swiss authorities reflects that the perpetrators' modus operandi was to use Voice over IP (VoIP) technology to call the employees of the targeted companies, which gave the appearance of calling from Swiss telephone numbers.
- d. For example, telephone surveillance data obtained by the Swiss authorities established that the Swiss-appearing telephone numbers utilized to contact the victim companies' employees via VoIP technology included +41225180564, +41225013961 and +41225181431, and that all three of these numbers were redirected to the Israeli mobile phone number +972-54-XXX-6332 (the "6332 mobile number"). Recordings of the telephone conversations between these VoIP numbers and the victim companies reflect that the individual whose calls originated from the 6332 number alternately presented himself to the victims as "Muller," "Morel," or "Lambert."
- e. Evidence provided by the Israeli authorities to the Swiss authorities reflects that the owner of the 6332 mobile number was Jonathan Camus BEN-SHIMON with a date of

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<sup>1</sup> The warrant also issued for the offense of qualified money laundering, in violation of SCC Art. 305bis paras. 1 and 2(a) and (c). The instant Complaint, however, focuses on information Switzerland has provided concerning the

birth July 7, 1986, and a specific Israeli passport.

- f. Also according to Israeli authorities, the mobile phone associated with the 6332 mobile number has been physically located on several occasions in the same place as another mobile phone that is associated with another Israeli mobile number, +972-52-XXX-4204 (the “4204 mobile number”), whose holder is the same BEN-SHIMON. Israeli police monitored the 6332 mobile number and the 4204 mobile number and ascertained, by means of voice comparison, that their user was the same person.
- g. For example, on 26 June 2018, one of the Swiss victim companies, Caviar House & Prunier Group, S.A, was contacted by the subject using the VoIP number +41225013961, introducing himself as “Lambert”; following that call, two unauthorized transfers, totaling approximately €186,000, were made from the bank account belonging to Caviar House & Prunier Group, S.A.
- h. All of the VoIP numbers identified were used in the same period of time as the ones linked to Ben-Shimon, and sometimes with the same aliases. Forensic examination of the victim companies’ computers by Swiss authorities also reflected that the perpetrators’ remote connections to several of the victim companies’ computer facilities resolved to IP addresses in Israel, many of which were hosted by the same Israeli provider, Partner Communications Company, including connections to computers of victim companies the individual who identified himself as “Lambert” contacted from the VoIP number ending in 3961.

7. Article 2 of the Treaty covers the offenses of which BEN-SHIMON is accused.

8. BEN-SHIMON is expected to transit through Newark Liberty International Airport in Newark, New Jersey, on approximately January 31, 2022, en route to Israel.

9. The Government of Switzerland has represented that it will submit a formal request for extradition, supported by the documents the Treaty specifies and within the time the Treaty requires.

10. BEN-SHIMON likely would flee if he learned of the existence of a warrant for his arrest.

WHEREFORE, the undersigned requests that a warrant for BEN-SHIMON's arrest issue in accordance with 18 U.S.C. § 3184 and the Treaty, so that the fugitive may be arrested and brought before this Court to the end that the evidence of criminality may be heard and considered, and that this complaint and the warrant be placed under the seal of the Court until such time as the warrant is executed.

*Blake Coppotelli*  
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Blake Coppotelli  
Assistant United States Attorney  
District of New Jersey

Sworn and attested to by Telephone Pursuant to F.R.C.P. 4.1(b)(2)(A) this 28<sup>th</sup> day of January, 2022.

*Michael A. Hammer* BC 11:46 a.m.  
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HONORABLE MICHAEL A. HAMMER  
United States Magistrate Judge